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*Attorneys for Defendants The Lustig Family
1990 Trust and David I. Lustig, individually
and in his capacity as Trustee for The Lustig
Family 1990 Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

V.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

V.

THE LUSTIG FAMILY 1990 TRUST, et al.,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss or, Alternatively, For a Stay, the Declaration of Bryan Ha dated December 22, 2014, the exhibits thereto, and all the pleadings and proceedings heretofore had herein, defendants The Lustig Family 1990 Trust and David I. Lustig, individually and in his capacity as Trustee for The Lustig Family 1990 Trust, by their undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on a date and at a time to be determined by the Court, for an Order dismissing the Complaint pursuant to Rules 9(b) and 12(b)(1) and (6) of the Federal Rules of Civil Procedure and Rules 7009 and 7012(b) of the Federal Rules of Bankruptcy Procedure or, alternatively, staying this action pursuant to 11 U.S.C. § 105, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
December 22, 2014

Respectfully submitted,

LAW OFFICE OF
RICHARD E. SIGNORELLI

By: /s/ Richard E. Signorelli

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